

Rich Sturdevant SBN 269088  
**Financial Relief Law Center, APC**  
1200 Main St. Ste C  
Irvine, CA 92614  
Telephone: (714) 442-3335  
Facsimile: (714) 361-5376  
rich@bwlawcenter.com

Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

In re:

2<sup>nd</sup> Chance Investment Group,

Debtors.

Adversary Case# 8:24-ap-01105-SC

Bankruptcy Case# 8:22-bk-12142-SC

Chapter 11

CLOTEE DOWNING, a legally incompetent  
individual,

Plaintiff,

v.

2<sup>nd</sup> CHANCE INVESTMENT GROUP  
LLC, a California Limited Liability Partnership;  
RAYSHWAN ANDREW FOSTER a.k.a.  
RAYSHAWN FOSTER a.k.a. RAYSHON  
FOSTER a.k.a. RAYSHON BOYD, an individual;  
SONJA FOSTER a.k.a. SONJA KIRK a.k.a.  
SONIA PEREZ, AN INDIVIDUAL; DAVID M.  
GOODRICH, an individual; DOES 1-100;

Defendants.

**NOTICE OF HEARING**

**Hearing:**

Judge: Hon. Scott Clarkson

Date: October 2, 2024

Time: 10:00 a.m.

Place: 411 West Fourth Street

Santa Ana, CA 92701

Ctrm: 5C

NOTICE IS HEREBY GIVEN that a hearing is set for October 2, 2024, at 10:00 a.m. in the  
United States Bankruptcy Court, Santa Ana Division, 411 West Fourth Street, Ctrm 5C, Santa  
Ana, CA, 92701 for Defendant's "Motion to Dismiss Plaintiff's Complaint Pursuant to FRCP

1 12(b)(6)” (“Motion”). The motion to dismiss, brought pursuant to Federal Rules of Civil  
2 Procedure 12(b)(6), is based on the grounds that Plaintiff fails to state a claim upon which relief  
3 may be granted.

4 NOTICE IS FURTHER GIVEN that Pursuant to Local Bankruptcy Rule 9013-1, any  
5 opposition to this Motion must be filed no less than 14 days before the hearing. Any reply to the  
6 opposition to this Motion must be filed no less than 7 days before this hearing.  
7

8  
9  
10 Dates: September 11, 2024

Respectfully Submitted,

11 /s/ Richard Sturdevant  
12 Richard Sturdevant, Esq.  
13 Financial Relief Law Center, APC  
14 Attorneys for Defendants  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28